# IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

REDACTED VERSION

٧.

UNDER SEAL

PAUL J. MANAFORT, JR.,

Crim. No. 17-201-1 (ABJ)

Defendant.

# DECLARATION IN SUPPORT OF THE GOVERNMENT'S BREACH DETERMINATION AND SENTENCING

I, Jeffrey Weiland, hereby declare as follows:

### A. Background

- 1. I have been a Special Agent with the Federal Bureau of Investigation (FBI) since March 2008. I am currently assigned to the Special Counsel's Office. As a Special Agent, I have previously investigated crimes including the corruption of public officials, arson, forced labor trafficking, racketeering, and terrorism. Prior to my employment with the FBI, I worked for seven years as an attorney, including clerkships with the United States Court of Appeals for the Fifth Circuit and the District Court for the Northern District of Illinois.
- 2. I submit this declaration pursuant to the Court's Order dated January 8, 2019, to provide the evidentiary basis to support finding the defendant's statements set out below were false. I have relied on my own work and that of other members of the team on this matter. This declaration does not contain all the evidence compiled by the FBI on these issues.

- 3. Paul J. Manafort, Jr., attended proffer sessions with the Special Counsel's Office and the FBI on September 11, September 12, and September 13, and debriefings on September 20, September 21, September 25, September 26, September 27, October 1, October 5, October 11, and October 16. Manafort also testified in the grand jury in the District of Columbia on October 26, 2018 and November 2, 2018. Defense counsel was present in all the above sessions except Manafort's testimony before the grand jury, due to the law regarding grand jury secrecy. Counsel was present outside the grand jury and available to Manafort. At the outset of the sessions, Manafort was advised that lying to the government could subject him to prosecution.
- 4. I participated in each of the proffers and debriefings. The reports I prepared of these sessions summarized information Manafort provided and are not verbatim recitations of the sessions. Similarly, the statements reported herein set out the substance of the statements, and are not verbatim.

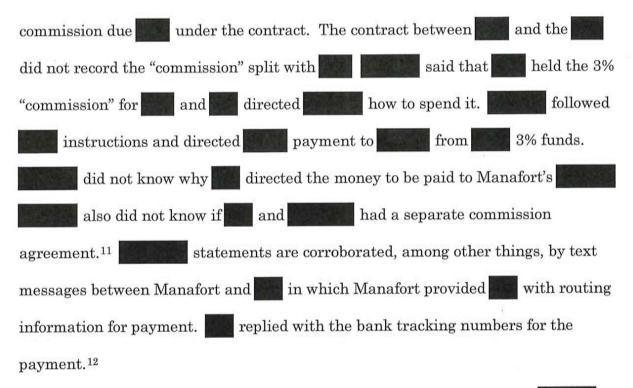
#### I. Payment To

- Overview
- 5. After signing the plea agreement, Manafort lied about a \$125,000 payment made in June 2017 to

  Manafort until August 2017. Records establish that the \$125,000 payment came from a worked for the

<sup>1</sup> Manafort has had a long relationship with the head of
and the head of the
6. In the summer of 2016, Manafort had been instrumental in setting up
the and having run it.3 The had engaged at Manafort's
suggestion and performed performed
The gave approximately \$19 million for
.4 Under the terms of the contract between and the was to
receive a 6% commission on all .5 According to half of the
commission was to be provided to although this was not reflected in the
written contract. <sup>6</sup>
Manafort's False and Misleading Statements
7. Manafort made, seriatim, inconsistent statements to the government
when asked about the payment: (1) on September 20, 2018, he said it was
repayment of a loan from Manafort to which Manafort instructed to pay
because Manafort owed money for its ;7 (2) on October
1, 2018, he said it was money was paying on Manafort's behalf because
<sup>1</sup> See Exhibit 1, payment records from Exhibit 2, Eagle Bank wire confirmation. <sup>2</sup> See Exhibit 3, P. Manafort 302, Oct. 1, 2018, p.1 ¶4; Exhibit 4, P. Manafort Grand Jury Testimony, Oct. 26, 2018, p.253.
<sup>3</sup> See Exhibit 5, 302, Dec. 12, 2017, p.16 ¶2 and p.17 ¶1.
4 See Exhibit 6, excerpts of bank records. 5 See Exhibit 7, Consulting Contract with Exhibit A.
6 See Exhibit 8, 302, Nov. 6, 2018, p.1 ¶2.  7 See Exhibi P. Ma ort 302, Sept. 20, 2018, p.6 ¶2 (** paid about \$50,000 to \$60,000 towards
Manafort's bill. owed Manafort the money."); E bit 4, P. Manafort Grand Jury Testimony, Oct. 26, 2018, pp. 254-57

Manafort had given work in the past, and Manafort asked to pay
what he owed Manafort directly to 38 and (3) on October 16, 2018, he said
Manafort requested to give the money to which would constitute a
loan from to Manafort, which Manafort would repay .9
• Proof Of Manafort's False And Misleading Statements
8. The falsity of the first explanation provided by Manafort is evidenced
by, among other things, that: not made the payment to the debt
owed Manafort (as reflected on Manafort's books and records) was \$20,000, not
\$125,000;10 and Manafort changed his explanations after Manafort was told the
above facts.
9. The falsity of the second version provided by Manafort is shown by,
among other things, statements to the government, corroborated by
payment records and text messages. told the government that the
payment was not money he owed Manafort for work Manafort had obtained for
Instead, said he made the payment to because he was
instructed to do so by told the government that hired to
work for the on the condition that personally receive half of the 6%
*
8 See Exhibit 3, P. Manafort 302, Oct. 1, 2018, p.1 ¶4 (* rationalized that the money he paid to the had come from the money he earned working for the Manafort has given millions of dollars in business over the years.") Manafort said the payment was declared as income to Manafort, and not treated as a gift. See Exhibit 3, P. Manafort 302, Oct. 1, 2018, p.2 ¶1.  Manafort explained that the reason he had previously mentioned was because Manafort asked to ask to pay and when spoke to said he would deal with Manafort directly. See Exhibit 9, P. Manafort 302, Sept. 20, 2018, p.6 ¶2.  9 See Exhibit 10, P. Manafort 302, Oct. 16, 2018, p.3. ¶3 (* paid Manafort's Originally, they planned for the payment to be a loan. Last year, they executed a note with a payment plan including interest. Manafort did not do any work for the money.")  10 See Exhibit 11, DMP International, LLC Financial Statements.



- Manafort's third version, that the \$125,000 was a loan by Manafort, is belied by, among other things: the statements of both and Manafort's tax preparer; Manafort's e-mail to his tax preparer; Manafort's tax return; and Manafort's lack of repayment of the "loan."
- a-half-weeks after he was first asked about the payment. Another week and a half later, Manafort provided the government with an unsigned promissory note, dated September 14, 2017 payment to was in June 2017), which included a payment schedule. The last of the three scheduled payments, totaling \$131,249.96, was due on September 15, 2018. Manafort stated that only one payment was ever

<sup>11</sup> See Exhibit 8, 302, Nov. 6, 2018, p.1 ¶2 and p.2 ¶4.

<sup>12</sup> See Exhibit 12, P. Manafort and Text Messages, June 20-29, 2017.

<sup>18</sup> See Exhibit 13, alleged promissory note.

made to in the amount of about \$6,000 within the last month. Manafort stated that the payment was subsequent to, but not because of, the government's inquiry about the \$125,000 payment.<sup>14</sup>

told the government that he did not make a loan to Manafort; instead, he made the payment to because he was instructed to do so by on behalf of Manafort, as noted above. 15 stated that he did not loan or gift any of his own money to Manafort or Manafort's counsel. Further, said when asked to contribute his own money to Manafort's legal defense, declined. Finally, said that he has never received any payments directly or indirectly from Manafort. 16

loan. In September 2017, Manafort e-mailed his tax preparer instructing him to treat the \$125,000 payment as "income" (which would be consistent with the payment being a "commission" given to Manafort from 3%). Manafort stated in that e-mail that he made the "vendor pay directly to ," "because of complications in my banking." The tax preparer accordingly included the \$125,000 as income in Manafort's 2017 tax return, although he did not know the factual circumstances that would warrant treating it as income. In October 2018, after the government's

<sup>&</sup>lt;sup>14</sup> See Exhibit 10, P. Manafort 302, Oct. 16, 2018, p.3 ¶3.

<sup>&</sup>lt;sup>15</sup> See Exhibit 8, 302, Nov. 6, 2018, p.1 ¶2 and p.2 ¶4; Exhibit 4, P. Manafort Grand Jury Testimony, Oct. 26, 2018, pp. 247-48

<sup>&</sup>lt;sup>16</sup> Exhibit 8, 302, Nov. 6, 2018, p.2 ¶6 and p.3 ¶¶1-2.

<sup>&</sup>lt;sup>17</sup> See Exhibit 14, E-mail, Sept. 24, 2017, P. Manafort to ("This is income for 2017.")

<sup>&</sup>lt;sup>18</sup> See Exhibit 15, excerpt of P. Manafort's 2017 filed tax return; Exhibit 16, 302, Nov 14, 2018, p.1 ¶4.

inquiry to Manafort about the \$125,000 payment, a Manafort representative e-mailed the tax preparer asking him how the "note" was handled. The representative also provided him with an unsigned loan document with respect to the \$125,000 payment, claiming that interest payments were made this year. <sup>19</sup> The tax preparer told the government that the October 2018 e-mail inquiry was the first he had ever heard that the payment was a purported loan. He did not change anything on the return based on the e-mail. <sup>20</sup>

# II. Konstantin Kilimnik's Role in The Witness Tampering Conspiracy

- Overview
- 14. At his proffer on September 11, 2018, Manafort admitted that he conspired with Kilimnik to obstruct justice by tampering with witnesses, as charged in the Superseding Indictment returned on June 8, 2018. As part of his guilty plea before this Court, Manafort again admitted to conspiring with Kilimnik to obstruct justice to tamper with two witnesses. Subsequently, in an interview on October 16, 2018, after his guilty plea, Manafort denied Kilimnik's knowing involvement in the conspiracy. That denial was false.
  - Manafort's False and Misleading Statements about Kilimnik's Role in the Obstruction Conspiracy
- 15. During an interview with the government on October 16, 2018, Manafort said that: Kilimnik did not believe that he was obstructing justice when he contacted

See Exhibit 17, E-mail, Oct. 30, 2018, to the second of the

(identified as Person D1 in the charging document) and (identified as Person D2); in Kilimnik's mind, he was only communicating information; Kilimnik did not feel that he exerted any pressure; and to Kilimnik, Europe was the fulcrum of the Hapsburg Group project. At the same session, Manafort added that he talked with Kilimnik after Kilimnik was indicted, that Kilimnik thought it was crazy that he had been charged, and that Manafort agreed that it was outrageous.<sup>21</sup>

- 16. The government notified Manafort's counsel that it believed Manafort's statements were inconsistent with what he had previously said to the government and allocuted to in court. The parties then took a break.
- 17. After speaking with his attorney, Manafort changed his account, and stated that: he conspired with Kilimnik; at the time he pleaded guilty, Manafort understood the elements of the conspiracy; Manafort and Kilimnik agreed to try to have say something that was not true; Kilimnik knew that the Hapsburg Group performed work in the United States; Kilimnik messaged to get him to say that the Hapsburg Group was Europe focused; and Kilimnik was guilty of obstruction of justice because he was aware of the facts and agreed to knowingly violate the law. Manafort told the government that he had not changed his statements, but the government had been confused about what he had said.
  - Proof that Manafort's Statements Were False and Misleading

<sup>&</sup>lt;sup>21</sup> Exhibit 10, P. Manafort 302, Oct. 16, 2018, p.6 ¶¶1-2. The defense has contended that Manafort did not lie on this topic as he could not speak to Kilimnik's state of mind. Sealed Response to OSC Breach Submission, Jan. 7, 2019 (Doc. 470). However, Manafort did just that in the debriefings.

18. Manafort's October 16, 2018, statements attempting to exculpate Kilimnik with respect to the charged obstruction of justice conspiracy are contradicted by his statements during a September 11, 2018 proffer with the government, his sworn statements before this Court during his guilty plea, his corrected statements on October 16, 2018, as well as the underlying proof of the conspiracy.<sup>22</sup> Manafort's statement that he had not changed his story was also false, as set forth above.

## The Superseding Indictment and Initial Proffer

19. On June 8, 2018, a grand jury sitting in the District of Columbia returned a seven-count Superseding Indictment charging Manafort and Kilimnik.<sup>23</sup> Count Six charged Manafort and Kilimnik with attempted obstruction of justice, pursuant to 18 U.S.C. §§ 1512(b)(1) and 2.<sup>24</sup> Count Seven charged both defendants with conspiracy to obstruct justice pursuant to 18 U.S.C. § 1512(k).<sup>25</sup> Both counts related to Manafort and Kilimnik's efforts to persuade two witnesses, identified as Person D1 ( and D2 ), to testify falsely

20. At the proffer on September 11, 2018, Manafort admitted his involvement in the charges in the criminal prosecution pending in the District of

<sup>&</sup>lt;sup>22</sup> Exhibit 100, P. Manafort Statement, Sept. 11, 2018; Statement of the Offenses and Other Acts, ¶¶44-46 and p.24, Sept. 14, 2018 (Doc. 423); Order, United States v. Manafort, No. 18-3037 (D.C. Cir. July 12, 2018) (Doc. 1740431); Opinion at pp.15-16, United States v. Manafort, No. 18-3037 (D.C. Cir. July 31, 2018) (Doc. 1743190) ("The District Court's treatment of the EDVA Stay-Away Order was merely part of the icing; the cake had already been baked.")

<sup>&</sup>lt;sup>23</sup> Superseding Indictment, June 8, 2018 (Doc. 318).

<sup>&</sup>lt;sup>24</sup> Id., ¶¶48-49.

<sup>&</sup>lt;sup>25</sup> Id., ¶¶50-51.

Columbia. With respect to the conspiracy to obstruct justice, Manafort stated the following (reading from a written statement under the heading "Witness tampering"):

- In response to press reports concerning the Superseding Indictment

  I attempted to contact [sic], a former consultant that I

  had worked with regarding Ukraine political issues, through a group

  known as the Hapsburg Group.
- I left a message for [sic] emphasizing that his group was working in Europe.
- I contacted KK and requested that he reach out to [sic] and another member of the Hapsburg group to do the same.
- knowing that [sic] and the members of the Hapsburg group also directed their Ukrainian outreach into the United States and previously including meeting with members of the U.S. government.
- 21. Manafort's counsel provided the written statement he read at the proffer to the government and it is an exhibit hereto.<sup>26</sup>

### Guilty Plea

22. Manafort more explicitly admitted Kilimnik's role in the charged conspiracy as part of his guilty plea before the Court. On September 14, 2018, Manafort pled guilty to both counts charged in a Superseding Information: (a) a conspiracy to defraud the United States (Count One), and (b) a conspiracy to obstruct

 $<sup>^{26}</sup>$  Exhibit 101, P. Manafort 302, Sept. 11, 2018, p.1  $\P 2;$  Exhibit 100, P. Manafort Statement, Sept. 11, 2018.

justice (witness tampering)(Count Two). Count Two specifically named Kilimnik as a conspirator (as did the original Superseding Indictment). Paragraphs 64 to 67 of the Superseding Information detailed the allegations of the obstruction conspiracy. In addition, as part of his plea agreement, Manafort admitted to a statement of facts. Paragraphs 44 through 46 in the Statement Of The Offenses And Other Acts, which he signed and initialed, also referenced the conspiracy with Kilimnik (and tracked the Count Two allegations).

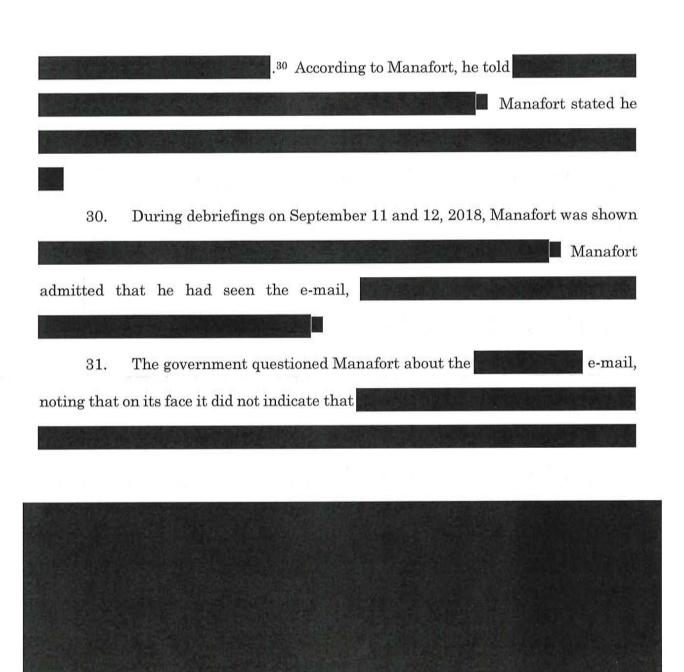
- 23. These documents set out that between February 23, 2018 and April 2018, Manafort conspired with Kilimnik to tamper with two witnesses described as Person D1 and Person D2 with respect to their potential testimony about the Hapsburg Group and its activity in the United States, namely to induce each to testify falsely that the Hapsburg Group did not involve work in the United States (thus not violating the Foreign Agents Registration Act).
- 24. As required by the Court at his guilty plea proceeding, Manafort acknowledged the facts in the Statement Of The Offenses And Other Acts to be true.<sup>27</sup>

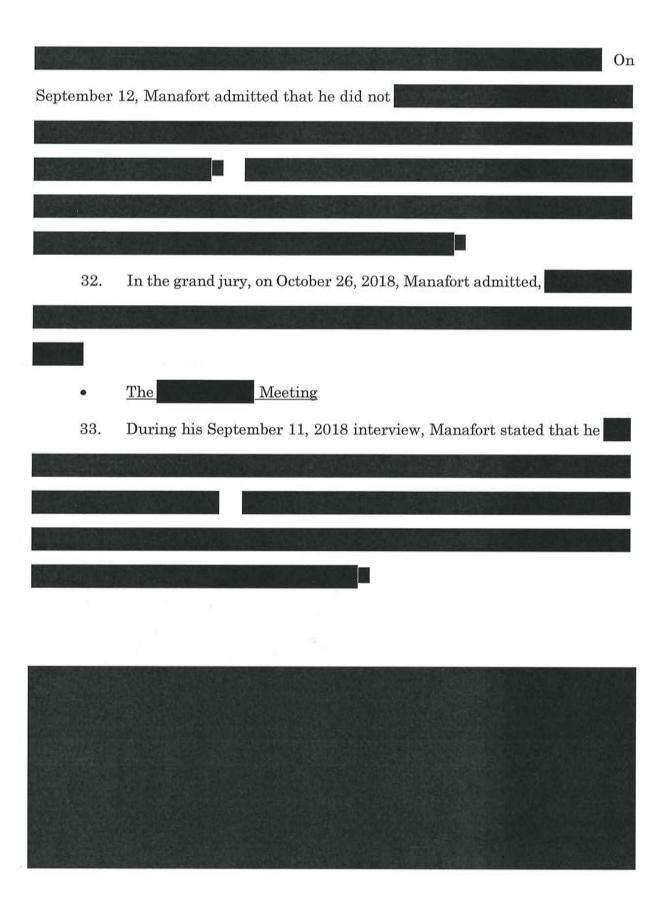
# III. <u>Interactions with Kilimnik</u>

- Overview of Interactions Between Manafort and Kilimnik

<sup>&</sup>lt;sup>27</sup> Tr. of Plea Hearing at pp.34-35, Sept. 14, 2018 (Doc. 424), acknowledging government recitation of the offenses and the facts in the Statement Of The Offenses And Other Acts ("And did you also, in fact, conspire with at least one other person to obstruct justice by tampering with witnesses concerning the FARA allegations in 2018?" And the defendant responded: "I did.")

	. The discussions on, on or around
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27.	In addition, as discussed below,
•	Manafort's False and Misleading Statements about the Fact And
	Frequency Of His Discussions Of The With Kilimnik
28.	Over the course of several interviews and in the grand jury, Manafort
gave variou	as accounts concerning his communications with Kilimnik about the
29.	In an interview on September 11, 2018, Manafort said that at an in-
person meet	ting in New York City on

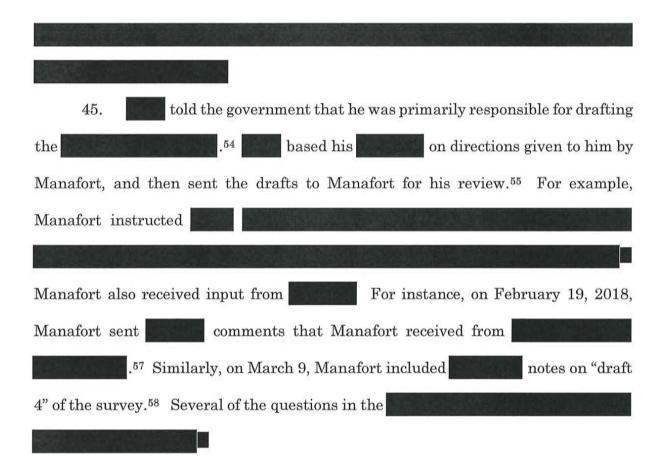




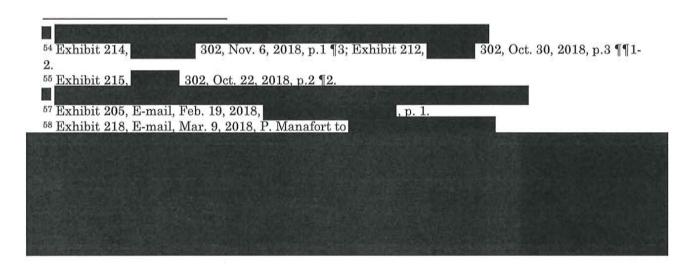
	34.	Subsequently, during a September 21, 2018, debriefing, Manafort stated
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	35.	During his grand jury testimony on October 26, 2018, Manafort testified
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	•	The Meeting  In his debriefings Manafort was asked about a
D. J.	36.	In his debriefings, Manafort was asked about a
	37.	In the September 11, 2018, session, Manafort said he
10/6		Manafort said he did not
	38.	On September 12, Manafort was again asked if he
		Manafort said that he had no memory of
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	, Manafort stated he
did not recall meeting	<b>表别是别是我们</b>
39. During an interview on Septemb	per 13, Manafort said that in fact he did
. Manafort asked	
<b>基金包括6000000000000000000000000000000000000</b>	Manafort stated he did not
40. During Manafort's grand jury	testimony on October 26, Manafort
testified that	SAN SERVICE STATE OF THE SAN SERVICE STATE STATE OF THE SAN SERVICE STATE STATE STATE STATE STATE STATE STATE STATE STATE
<b>经历</b> 基本的经验的经验。	
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41.	41. Manafort was asked in the grand jury about his work in 2018 on										
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had not me	entioned the	during any of his twelve									
interviews	and had said he had last discussed the	in spring									
2017.											
42.	Records establish that on	2018, Manafort had executed a									
高级 第		<b>支持</b> 基本 (1)									
43.	On February 21, 2018, Manafort e-m	ailed and and									
		Land Bridge Control of the State of the Stat									
	a document entitled	The									
document p	properties show it was created by	and modified by Manafort. <sup>50</sup>									
Manafort to	estified that sent him the docur	$\mathrm{ment.}^{51}$									
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<sup>49</sup> Exhibit 201 <sup>50</sup> Exhibit 213	1, E-mail, Feb. 21, 2018, P. Manafort to Feb. 10, 2018.										
51 Exhibit 4, I	P. Manafort Grand Jury Testimony, Oct. 26, 2018	3, pp. 138-139.									

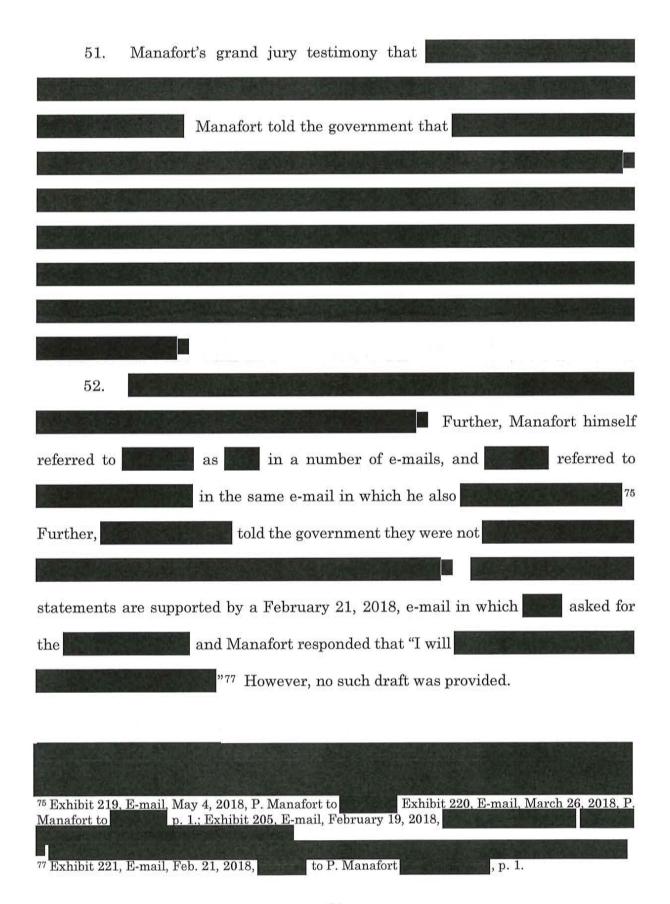


Manafort's grand jury testimony



	46.	In the grand jury, Manafort testified that he sought to
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	47.	Manafort was asked in the grand jury
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		Manafort explained that he had not told
	48.	Manafort was then asked what
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		After a lunch break, Manafort
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	•	Manafort's False and Misleading Statements about
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49.	During his interview on September 11, 2018, Manafort stated he
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	During Manafort's grand jury testimony on October 26, in response to a
question as	to whether
Manafort re	esponded:
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intrinue à	Manafort further testified:
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•	Proof of Manafort's False and Misleading Statements
50.	With respect to the communications about the the the the the the the the the th
government	t notes the following additional facts.
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53. With respect to the	, evidence (including
e-mails and testimonial evidence) indicates that Man	nafort
54. During interviews with Gates, Gates tol	d the government that he was
instructed by Manafort to	1000年末6人公司
	Software Resident
On multiple oc	casions,
55. In addition,	APPLICATION OF THE
that referenced his access to	. In eight separate e-
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mails during that period,	
56. Finally, as noted, on the evening of	, Manafort met with
	Gates attended, but arrived
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	A review of Manafort and Gates's e
mails con	firmed that both
IV.	Another DOJ Investigation
•	Overview

- 58. Manafort gave different versions of events surrounding an incident in : one version that was more incriminating was given prior to signing the plea agreement (on September 13, 2018), and another that was more benign was made after on October 5, 2018, after his plea. When confronted with the inconsistency by the government and his own counsel, Manafort largely retracted the second version.
  - Manafort's False and Misleading Statements

59.	During an interview on October 5, 2018, which included representatives
of	, Manafort addressed the aforementioned incident. Manafort gave an
anodyne v	ersion of the incident. He said he received a call from
<b>HEREN</b>	
1887 P. C.	
PHENO	. The conversation was part of a
longer mee	eting on other subjects.85 Manafort said that
King Poly	In the debriefing, Manafort did not state
60.	At this point in the debriefing, Manafort's attorneys gave him a
typewritte	n document to read, representing it was notes of what Manafort previously
told the go	vernment on the subject. Manafort then stated that around the same time
that	called Manafort about
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TWES	Manafort stated he did not know of
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<sup>85</sup> Exhibit 300, P. Manafort 302, Oct. 5, 2018, p.1 ¶2.

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注:10.000 P. 10.000 P.	
。 14. 12. 15. 15. 15. 15. 15. 15. 15. 15. 15. 15	
No. of the Control of	
65. Manafort said that after the	
66. Manafort stated that after this meeting, but prior to his leaving the	ıe
campaign (on August 19),	3
not how it was handled. <sup>91</sup> Manafort noted that subsequent to his call	
V. <u>Manafort's Contact with the Administration</u>	
• <u>Overview</u>	

- 67. Manafort told the government that he did not have any contact, direct or indirect, with any member of the Administration and did not try to have such contact. Evidence demonstrates that Manafort's statements were false. Documentary evidence establishes that Manafort agreed to have messages sent to the Administration, including about Administration

  Gates has also said that Manafort told Gates about his contact with the Administration. And during his grand jury testimony, when confronted with documents, Manafort admitted
  - Manafort's False and Misleading Statements Regarding Contact with the Administration
- 68. Manafort stated on several occasions that he never spoke to anyone in the Administration, either directly or indirectly. For instance, during an interview with the government on October 16, 2018, Manafort stated he had no direct or indirect communications with anyone in the Administration while they were in the Administration, and that he never asked anyone to try to communicate a message to anyone in the Administration on any subject matter. <sup>94</sup> Manafort stated that he spoke with certain individuals before they worked for the Administration and after they left the Administration, but not while they were in the Administration. <sup>95</sup>

<sup>&</sup>lt;sup>93</sup> This is not a complete listing of such contacts Manafort had with Administration officials. Further, for the purposes of proving the falsity of Manafort's assertions in this section, the government is not relying on communications that may have taken place, with Manafort's consent, through his legal counsel. We previously so advised the defense.

<sup>94</sup> See Exhibit 10, P. Manafort 302, Oct. 16, 2018, p.2 ¶5.

<sup>95</sup> See id.

•	Proof that Manafort's Statements Were False and Misleading
69.	Evidence demonstrates that Manafort had contacts, and tried to have
contacts,	through others, with the Administration. Indeed, Manafort ultimately
conceded	
	体表现的重要多数数据的150mm的160mm 和增加的160mm的250mm。
70.	Further, during his grand jury testimony, Manafort was asked about
特別	(1)
7 10 16 14	

71. Further, in May 2018, Manafort was involved in an effort to
Additionally, a
Word document was identified in Manafort's iCloud that referenced dated
May 15, 2018 and, per the metadata, was authored and edited by Manafort. 103
Under a section titled "Targets," a bullet point stated "ISSUE: PJM [Manafort] will
find out if When asked during grand
jury testimony about Manafort stated

VALUE OF THE PROPERTY OF THE P	Vhen asked
if he reached out to	
<b>医克里克斯氏病 医水子 医水子 医水子 医水子 医</b>	
	\$ S. 1.
72. Further, on May 26, 2018, texted Manafort and	asked him:
"If I see POTUS one on one next week am I ok to remind him of our rela	ationship?"
Manafort responded to the text, "[y]es" and "[e]ven if not one on one."	During
Manafort's grand jury testimony, he confirmed	VIII A
在AMA 100 FEB	
多13. 15. 15. 15. 15. 15. 15. 15. 15. 15. 15	30/1853
	A SWA
73. In addition to this documentary evidence, Gates has	told the
government in debriefings that in approximately January 2017, Manafort	told Gates
that he was using intermediaries, including to get people appoint	nted in the
Administration. Manafort said he was talking to	No. of the

up through approximately February 2018 (the time of Gates' guilty plea). 108

### Conclusion

Based on the above factual circumstances, among others (including my assessment of Manafort's demeanor), it is my belief that Manafort made false and misleading statements in breach of the plea agreement with the government. 109

I certify, under penalty of perjury that the foregoing is true and correct.

Executed on Ol 14/2019

Jeffrey Weiland

Special Agent, Federal Bureau of Investigation

Defendant said in his pleading that he has provided electronic devices to the government. However, although he has provided some electronic data, passwords, and documents, in more than ten instances he did not provide passwords to access his electronic communications, thumb drives, or documents.

# Exhibit 1

Beneficiary Information	Amount	Date / Time	Originating Information	Reference Numbers
Account **** 0789	125,000.00	Date Posted:		Fed Reff.
		06/26/17	Bank	334
ORIGINATOR INFORMATION:		Received	EAGLEBANK	Global Ref#
		06/26/17		5601
		15:58:55		
Beneficiary Information	Amount T	Date / O	Originating Information	Reference Numbers
Account.***0789 500,000.00	900,000,005	Date Posted:	PAUL MANAFORT	Fed Ref#:
		08/22/17	Bank	2171
RE: PAUL MANAFORT - ORIGINATOR INFORMATION: 8952		Received:	THE FEDERAL SAVINGS BANK	Globa
		08/22/17		9801
		14:03:25		

# Exhibit 2

https://eaglebank.ebanking-services.com/nubi/Wire/Views/Freeform\_Wi...

## **EAGLEBANK**

# Wire Confirmation

The wire transfer request below has been submitted. The template created with the transfer request has been created successfully.

The balances shown below are recorded at the time of the request.

#### Schedule Information

Confirmation:

9965

Approval status:

1 of 1 received

Transmitted:

06/26/2017 03:24:23 PM (ET)

Transmitted by:

**MA11** 

#### **Debit Information**

Template name:

MMSC SECONDARY - \*7107 - Checking - \$132,087.56

Account:

(Balance as of: 06/26/2017 03:14:59 PM (ET) Not a guarantee of available funds.)

Wire type:

Domestic wire

Security code:

06/26/2017

Send on date:

\$125,000.00

Amount: Currency:

### Recipient Information

Bank ID type:

ABA

Bank ID:

0116

Recipient account: (If appropriate enter

the IBAN)

0789

Bank name:

CITIBANK NA

Bank address 1:

Bank address 2:

WASHINGTON, DC 20004

Bank address 3: Recipient name:

Recipient address 1: Recipient address 2:

Recipient address 3: Additional information for recipient:

# First Intermediary Information

Bank ID type:

Bank ID:

Intermediary account: (If appropriate enter the IBAN)

Wire Confirmation

https://eaglebank.ebanking-services.com/nubi/Wire/Views/Freeform\_Wi...

Bank name:

Bank address 1:

Bank address 2:

Bank address 3:

### Second Intermediary Information

Bank ID type:

Bank ID:

Intermediary account: (If appropriate

enter the IBAN)

Bank name:

Bank address 1:

Bank address 2:

Bank address 3:

### Wire Initiator Information

Wire initiator name:

Wire Initiator address 1:

Wire initiator address 2:

Wire Initiator address 3:



advice.txt EagleBank Outgoing Wire - Advice of Debit Wire Create Time (PST): 1258 Date 06/26/2017 : \*\*\*\*17107 Account # Name : \$125,000.00 Amount 3700 GFX Reference Beneficiary Bank: CITIBANK FSB WASH 3116 Beneficiary: Beneficiary Info (OBI): Bank to Bank Info (BBI): Reference for Beneficiary (RFB): Other Info: Fed Reference Number 9221 IMAD:

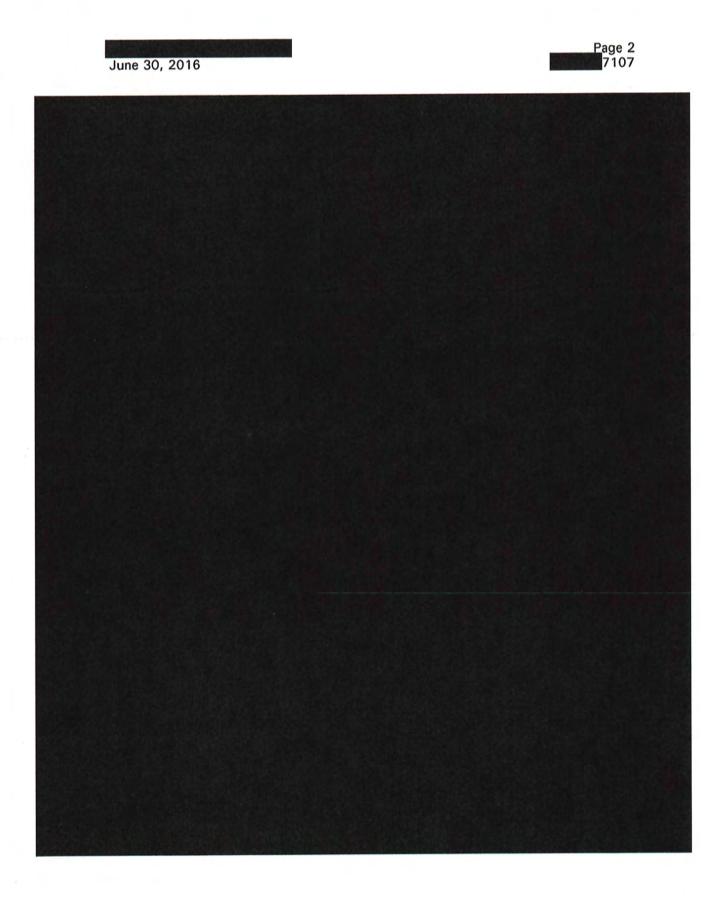
Fees will be charged as per respective fee schedules.

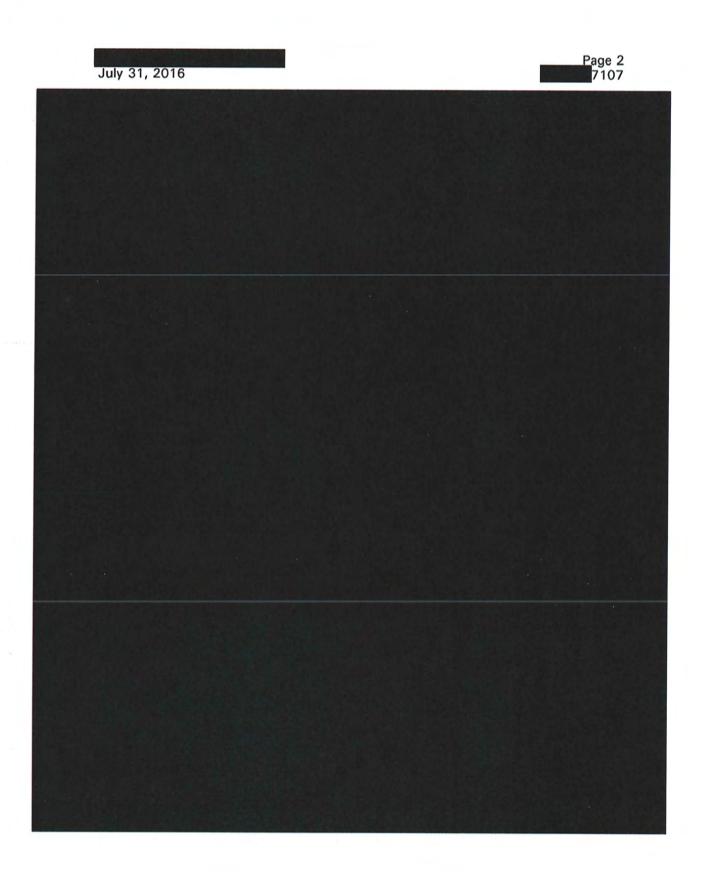
OMAD:

This message is for the sole use of the intended recipient, and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by phone or fax and destroy all copies of the original message.

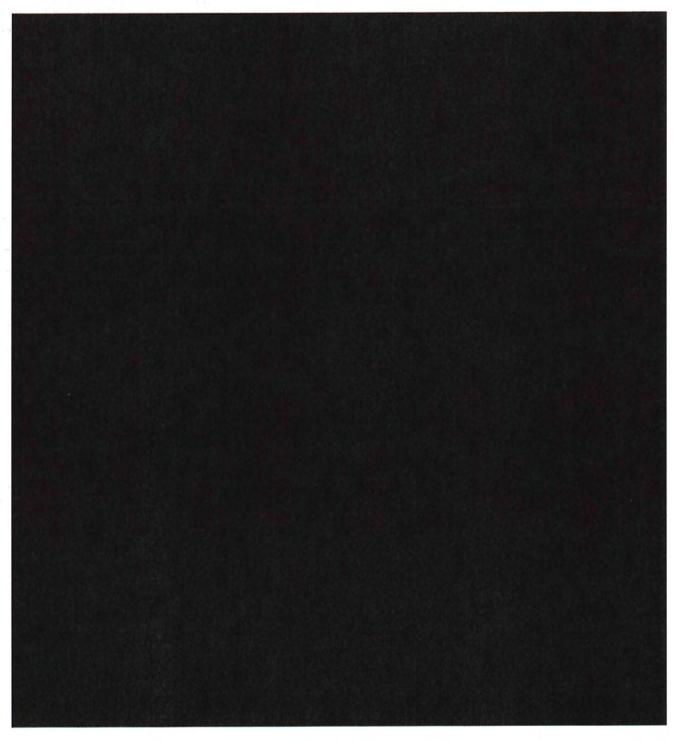
advice.txt
Please do not respond to this email address as it is an unmonitored mailbox.

Questions related to this email should be directed to your local EagleBank wire department at

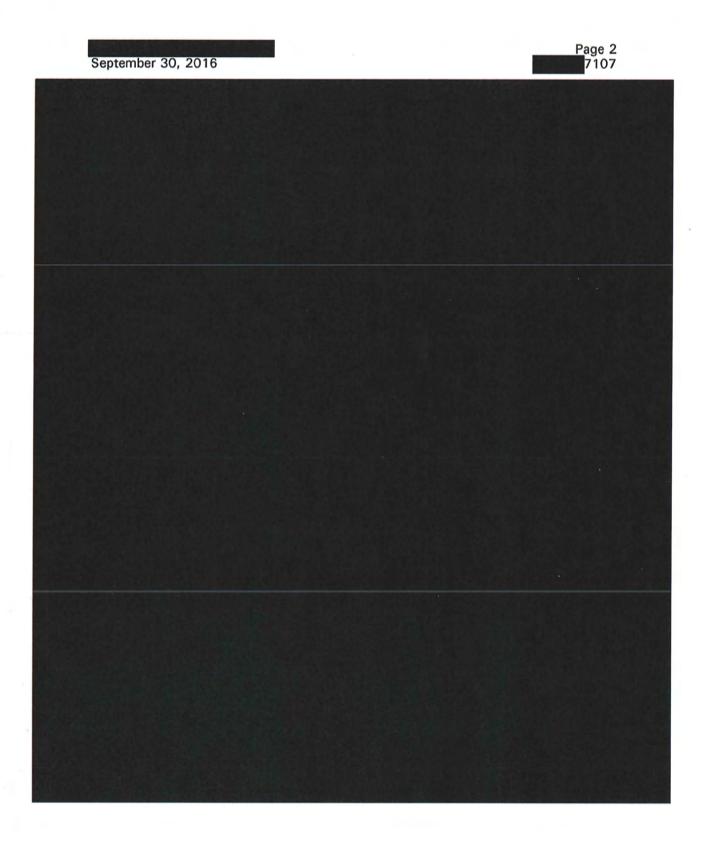


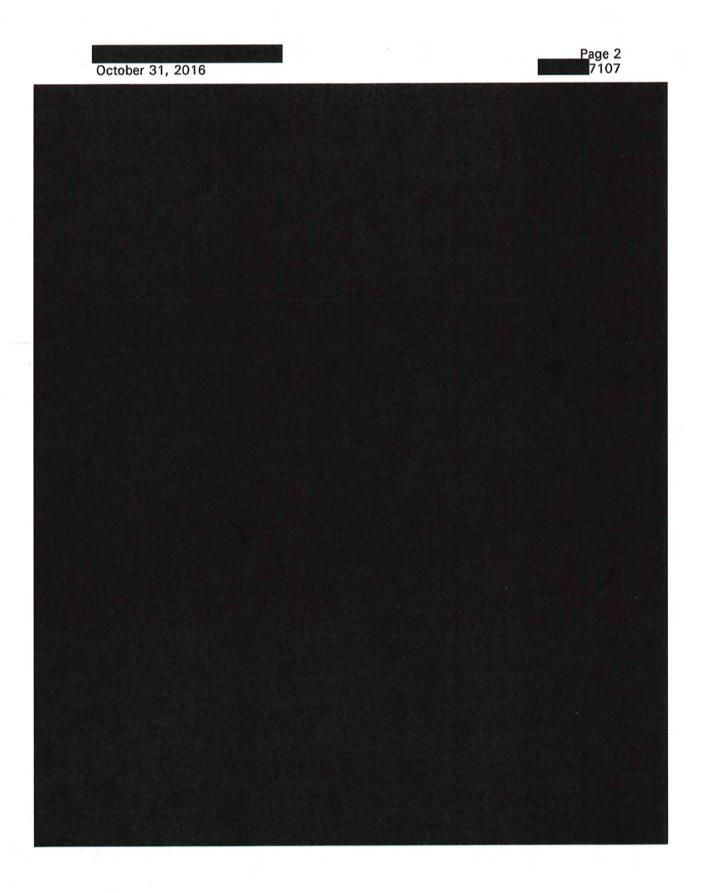


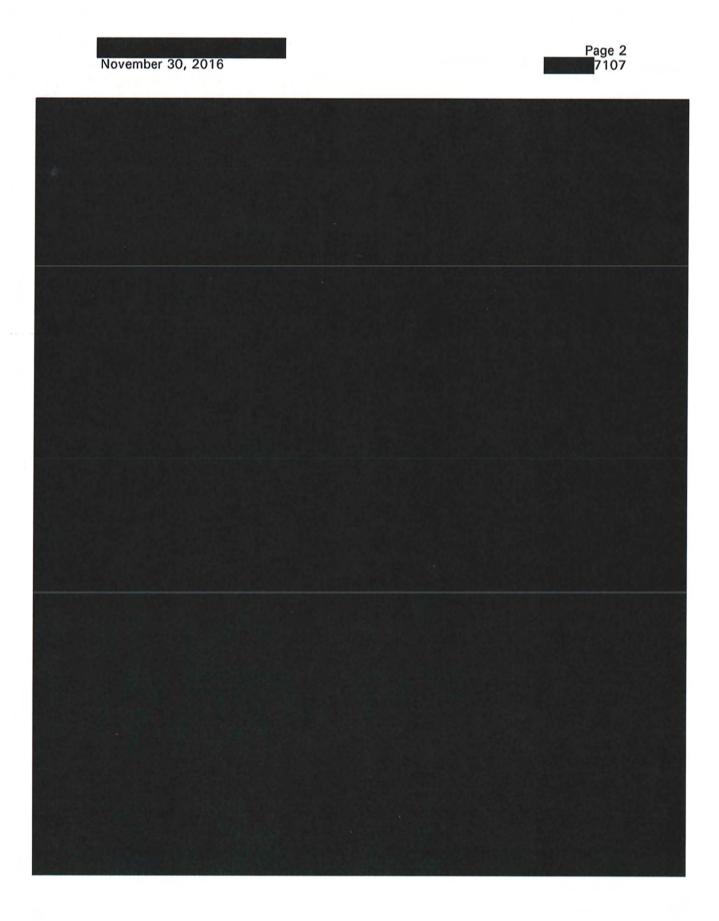
Page 5
August 31, 2016
7107











#### DMP INTERNATIONAL, LLC SCHEDULE OF ASSETS AND LIABILITIES (INCOME TAX BASIS) DECEMBER 31, 2016

#### NOTES AND LOANS RECEIVABLE

NOTES	AND	LOANS	RECEI	VABLE
OTHE	R LO	ANS		

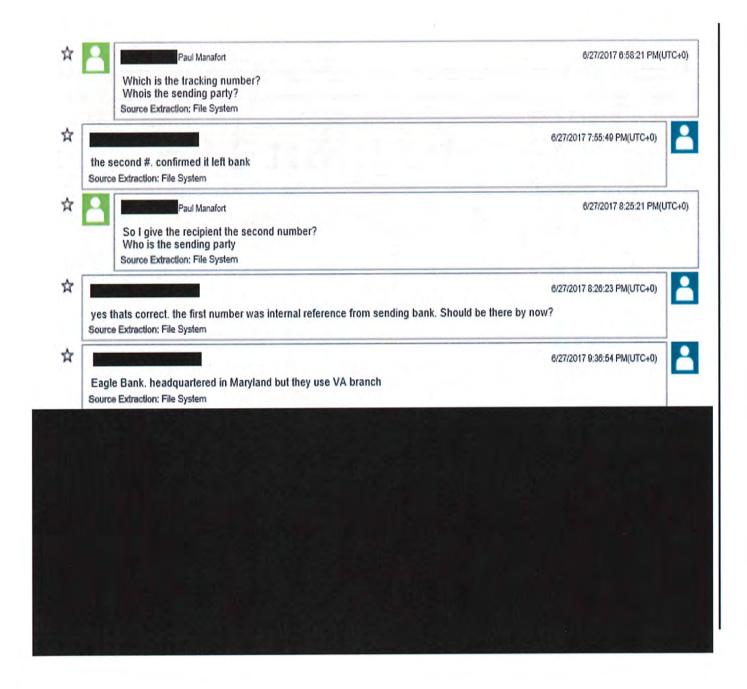
TOTAL OTHER LOANS

\$ 20,000 29,200 \$ 49,200

DUE FROM AFFILIATES
PAUL AND KATHLEEN MANAFORT
TOTAL DUE FROM AFFILIATES
TOTAL NOTES AND LOANS RECEIVABLE
TOTAL NOTES AND LOANS RECEIVABLE

1,821,356 \$ 1,821,356 \$ 1,870,556 \$ 1,870,556





#### PROMISSORY NOTE SECURED

\$125,000.00

Palm Beach Gardens, Florida Date: September 14, 2017

FOR VALUE RECEIVED, the undersigned promises to pay to the order of "Payee") in Fort Lauderdale, Florida, or at such other place as the holder of this Note shall designate by written notice to the undersigned, the sum of ONE HUNDRED AND TWENTY FIVE THOUSAND DOLLARS (\$125,000.00), in lawful money of the United States, with interest thereon from and including the date of this Note, but not including the date this Note is paid. Simple interest shall accrue at the rate of 5% per annum. Payments shall be made pursuant to the following schedule:

March 15, 2018 - \$65,624.98;

June 15, 2018 - \$32,812.49;

September 15, 2018 - \$32,812.49.

Principal and interest shall be payable to the Payee in lawful money of the United States.

In the event this Note is not paid when due, the undersigned promises to pay, in addition to the unpaid principal sum, together with all accrued interest, all costs of collection including reasonable attorney's fees.

The undersigned hereby waives presentment and demand for payment, notice of dishonor, protest and notice of protest of this Note.

This Note shall be deemed to have been entered in the State of Florida and any dispute arising hereunder shall be commenced in a court having appropriate jurisdiction within the State of Florida.

By:		
	Paul Manafort	
	Dated:	

Paul Manafort From: Sunday, September 24, 2017 10:55 AM Sent: To: 2017 Income Subject: This is income for 2017. I had the vendor pay directly to I made the payment this way because of complications in my banking. I will explain to you when I meet. will be sending me the 1099s at the appropriate time. Pls enter as income for me for 2017 in your ledger. Thank you Paul From: Date: Thursday, September 21, 2017 at 2:40 PM To: Paul Manafort Subject: Was Good Talking Yesterday As you are aware, on June 26, 2017, paid \$125,000,00 to on your behalf. We will get you the tax documents you need as required. Let me know if you have any questions. Look forward to seeing you again sometime in the next few weeks.

From: Tuesday, October 30, 2018 4:21 PM Sent: To: Re: Spoke with PM Subject: Note.pdf Attachments: Paul borrowed \$125k from him last year. I dont have the signed version, but attached is the draft which I think was signed without change. made the interest payments this year (I think current). Is there even anything that you need to have done with it? On Tue, Oct 30, 2018 at 4:12 PM wrote: I am not aware of any note from that name. What is it? > On Oct 30, 2018, at 4:10 PM, wrote: > He asked how you handled the \$125k note from > Also, I am seeing him on Saturday. Do you need me to take anything to him?

#### PROMISSORY NOTE SECURED

\$125,000.00

Palm Beach Gardens, Florida Date: September 14, 2017

FOR VALUE RECEIVED, the undersigned promises to pay to the order of "Payee") in Fort Lauderdale, Florida, or at such other place as the holder of this Note shall designate by written notice to the undersigned, the sum of ONE HUNDRED AND TWENTY FIVE THOUSAND DOLLARS (\$125,000.00), in lawful money of the United States, with interest thereon from and including the date of this Note, but not including the date this Note is paid. Simple interest shall accrue at the rate of 5% per annum. Payments shall be made pursuant to the following schedule:

March 15, 2018 - \$65,624.98;

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The undersigned hereby waives presentment and demand for payment, notice of dishonor, protest and notice of protest of this Note.

This Note shall be deemed to have been entered in the State of Florida and any dispute arising hereunder shall be commenced in a court having appropriate jurisdiction within the State of Florida.

Ву:		
	Paul Manafort	
	Dated:	

#### **Manafort Proffer**

#### EDVA (Guilty Verdicts on Counts 1-5, 12, 25, 27)

#### Counts 1-5 (7206(1))

- -I told my bookkeeper and accountants about income that passed into my U.S. bank accounts
- I did not reveal to them the income that went from my Cypriot bank accounts to vendors in the U.S. for my personal benefit.
- -My individual income tax returns thereby underreported my income, and I knew that they were false when I filed them.
- -I removed my signature authority over the various Cypriot bank accounts but I continued to exercise control over the accounts by instructing Rick Gates how to transfer the monies in those accounts.
- -When my accountants asked me if I had any foreign bank accounts, I answered "no." As a result, Schedule B of my Form 1040 Individual Income Tax Returns was false, and I knew that it was false when I filed it.

#### Counts 11-14 (FBAR)

-when my accountants asked me if I had any foreign bank accounts, I answered "no." As a result, I caused my accountants to fail to file annual FBAR forms, and I knew that I was required to file them.

#### Counts 24-25 (Citizens Howard Street)

- -I submitted a false 2014 DMI tax return to Citizens in support of my loan application. It was false in that it reported a \$1.5 million debt to Peranova. I knew that this was not a bona fide loan and was actually income in a prior year.
- -I then caused Rick Gates and others to create and send false documentation to Citizens showing that the Peranova loan had been forgiven in 2015.
- -I falsely represented to Citizens that Howard Street was a second home for Jeff Yohai and Jessica and was not a rental property, when I knew that they were renting out the property.

#### Counts 26-27 (Banc of California)

-I caused to be submitted to the Banc of California a falsified 2015 DMI P&L that overstated income by \$4 million.

#### Count 28 (Citizens Union Street)

I caused Jeff Yohai to submit on my behalf a falsified 2016 DMI YTD P&L that overstated income by more than \$2 million.

#### Counts 29-32 (FSB)

- -I caused to be submitted to FSB doctored P&Ls for DMI for 2015 and 2016, which overstated income by \$4 million and \$3.5 million
- -I also falsely represented to FSB that a \$300,000 delinquency on my DMI AMEX card was not DMI's but rather was Rick Gates's personal expenditure and had Rick Gates submit a false letter in support.

#### FARA

- -I failed to register as an agent of a foreign principal.
- -I knew that my representation of the Party of Regions within the United States, including a meeting with a U.S. Congressman, required me to file a FARA statement.
- -I also aided and abetted to register as agents of a foreign principal.
- -I assisted them in using a nominee client, the ECFMU, to create the appearance that they qualified for the LDA exemption to FARA when we all knew that their true client was the Party of Regions.
- -I caused false statements to be made to the DOJ FARA office of the National Security Division of the DOJ.
- -I knew that DMI's representation of the Party of Regions included meetings and outreach within the United States. I also knew that Rick Gates and I arranged and facilitated communications with U.S. officials and media outlets.
- -I also knew that, although DMI had a written 30-day document retention policy, Rick Gates and I had and could have produced documents that were older than 30 days.
- -I together with Rick Gates, failed to file Foreign agent registration forms.

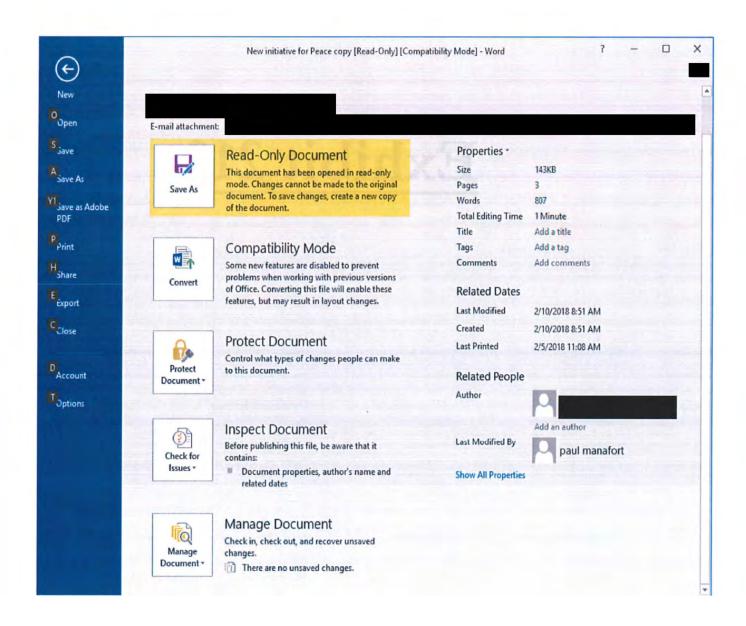
#### Count 2 (Conspiracy to Launder Money)

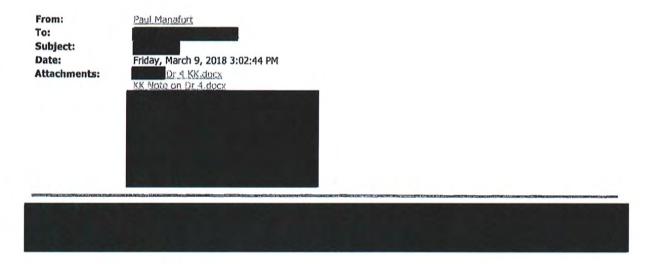
- -I, together with Rick Gates, conducted financial transactions by sending money from Cyprus to the United States to pay for my personal expenditures and investments, knowing that the money came from my consulting work in Ukraine for which I did not register under FARA.
- -The transactions were not reported to the bookkeeper or accountants and were therefore not reported on my federal income tax returns thereby underreporting my taxable income

#### Count 3 (Failure to Register under FARA)

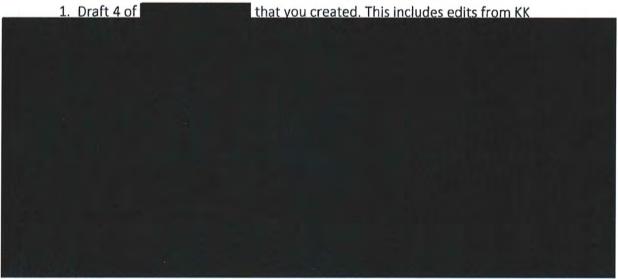
-I failed to register as an agent of a foreign principal. I knew that my representation of the Party of Regions within the United States, including a meeting with a U.S. Congressman, required me

to file a FARA statement, as did my role in supervising the activity of U.S. consultants who conducted lobbying activity in the U.S. and assisting in those activities.	
-I also aided and abetted the second of the	
Count 5 (False Statements (1001))	
-I made the false statements described in Count 4 to the FARA office, which is a part of the Executive Branch of the U.S. government.	
Witness tampering	
-In response to press reports concerning the Superseding Indictment I attempted to contact I attempted, a former consultant that I had worked with regarding Ukraine political issues, throa group known as the Hapsburg Group	
-I left a message for Mr. emphasizing that his group was working in Europe.	
- I contacted KK and requested that he reach out to Mr. and another member of the Hapsburg group to do the same	e
-knowing that Mr. and the members of the Hapsburg group also directed their Ukrainian outreach into the United States and previously including meeting with members of the U.S. government.	ů.

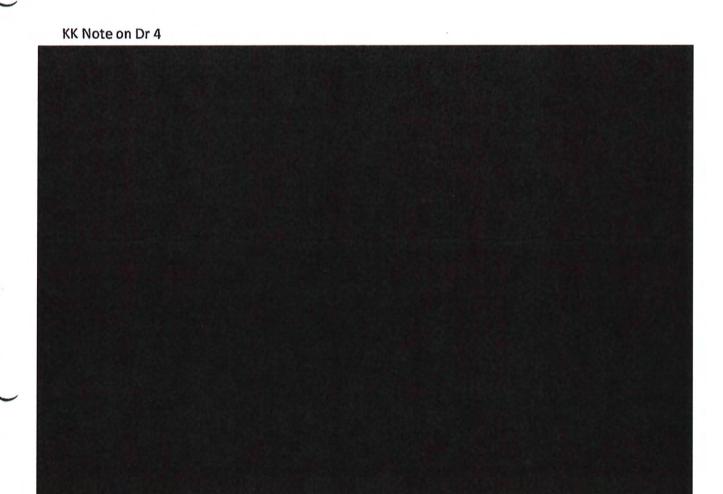




I am attaching several documents:



Thank you Paul



#### Case 1:17-cr-00201-ABJ Document 476-1 Filed 01/15/19 Page 95 of 157

From: Paul Manafort

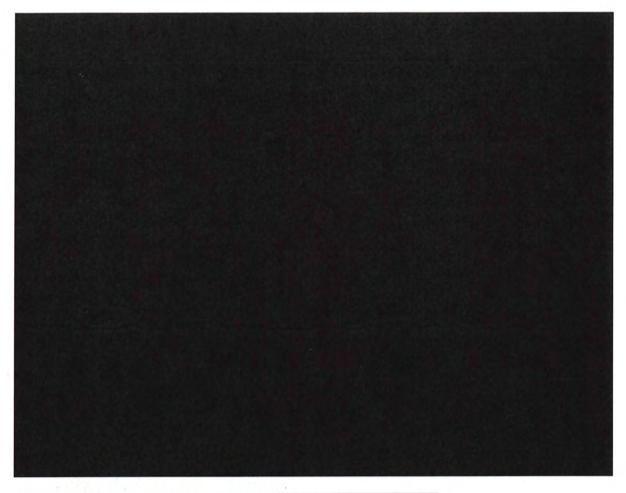
**Sent:** Friday, May 4, 2018 3:49 PM

To:

Subject: Maybe this will help

Maybe will see some value in this.

Р



On Mar 26, 2018, at 5:03 PM, Paul Manafort wrote:

Did you send this to or should I do so?

